

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
(EASTERN DIVISION)

Docket No. 05-CV-10464PBS

TIMOTHY M. BROWDER,  
Plaintiff

v.

NATIONAL FINANCIAL SYSTEMS,  
INC.,  
Defendant

**MOTION FOR ADMISSION *PRO HAC VICE* OF  
ATTORNEYS ALBERT E. FOWERBAUGH, JR. AND MICHAEL G. SALEMI  
FOR DEFENDANT NATIONAL FINANCIAL SYSTEMS, INC.**

Steven S. Broadley, counsel for Defendant National Financial Systems, Inc. in the above-captioned action, hereby moves, pursuant to Local Rule 83.5.3(b), that Albert E. Fowerbaugh, Jr. and Michael G. Salemi be admitted *pro hac vice* as co-counsel for Defendant National Financial Systems, Inc. in this case. In support of this motion, Steven S. Broadley states as follows:

1. Counsel for Plaintiff has been contacted regarding this motion and does not object to this motion.

2. As set forth in the certificates attached hereto, attorneys Fowerbaugh and Salemi are members in good standing of every jurisdiction where they have been admitted. Mr. Fowerbaugh is a member in good standing of the bars of the United States Supreme Court, the Supreme Court of the State of Illinois, the United States Court of Appeals for the Seventh Circuit, the United States Court of Appeals for the Ninth Circuit, the United States District Court for the Northern District of Illinois, and the United States District Court for the Northern District of Texas. Mr. Salemi is a member in good standing of the bar of the Supreme Court of the State of Illinois and the United States District Court for the Northern District of Illinois.

3. There are no disciplinary proceedings pending against attorneys Fowerbaugh or Salemi.

4. Attorneys Fowerbaugh and Salemi are familiar with the Local Rules of the United States District Court for the District of Massachusetts.

5. The undersigned counsel states further that he has filed an appearance for the Defendant National Financial Systems, Inc. in this case.

**WHEREFORE**, Defendant National Financial Systems, Inc.'s counsel Steven S. Broadley respectfully requests that this Court admit Albert E. Fowerbaugh, Jr. and Michael G. Salemi *pro hac vice* as co-counsel for Defendant National Financial Systems, Inc. in this case.

Respectfully submitted,

**NATIONAL FINANCIAL SYSTEMS, INC.**

By its attorney,



Steven S. Broadley, BBO #542305  
Posternak Blankstein & Lund, LLP  
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**CERTIFICATE PURSUANT TO LOCAL RULE 7.1(A)(2)**

Pursuant to Local Rule 7.1(A)(2), the undersigned counsel certifies that prior to filing this motion he contacted plaintiff's counsel in a good faith attempt to resolve or narrow the issues that are the subject of this motion.

  
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Steven S. Broadley

Dated: June 8, 2005

**CERTIFICATE OF SERVICE**

I, Steven S. Broadley, Esquire of Posternak, Blankstein & Lund, LLP, hereby certify that on this 8 day of June, 2005, I caused a copy of the above **Motion for Admission Pro Hac Vice of Attorneys Albert E. Fowerbaugh, Jr. and Michael G. Salemi for Defendant National Financial Systems, Inc.** to be mailed to:

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Steven S. Broadley